Case 2:23-mj-30016-DUTY ECF No.  $\frac{1}{\text{AUSA}}$  Page D.1. Filed 01/18/23 Page 1 of 5 Telephone: (313) 226-9100

AO 91 (Rev. 11/11) Criminal Complaint

United States of America

Amont Johnson

Special Agent: Randall Olsen

## UNITED STATES DISTRICT COURT

for the

Case: 2:23-mj-30016 Eastern District of Michigan

Assigned To: Unassigned Assign. Date: 1/18/2023

Case No.

Description: RE: AMONT

Telephone: (313) 202-3400

**JOHNSON** 

(EOB)

		CR	IMINAL COMP	LAINT		
I, the co	mplainant in this ca	se, state that the	ne following is true	e to the best of my knowled	ge and belief.	
On or about the date(s) of		Jan	nuary 1, 2023	in the county of	Wayne	in the
Eastern	District of	Michigan	, the defendan	t(s) violated:		
	Code Section		Offense Description			
	18 USC § 922(g)(1)		Felon in possession of a firearm			
This oni	minal complaint is b	agad on thaga	facts			
see attached affida	•	ased on these	lacts.			
✓ Continued of	on the attached shee	÷		592 541 74		
Continued on the dimense sheet.		•	Randae		Olsen	
				Complainant's		
				Randall B. Olsen, Special Agent (ATF)  Printed name and title		
Sworn to before me and/or by reliable e	e and signed in my prese	nce	1			
and/or by remadie e	lectronic means.			Jones G. M.		
Date: Januar	ry 18, 2023			Judge's signature		
City and state: Det	troit, Michigan			Hon. David R. Grand, United	States Magistrate J	udge
				Printed name and title		

# AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Special Agent Randall B. Olsen, being first duly sworn, hereby depose and state the following:

### **INTRODUCTION**

1. I have been employed as a special agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), United States Department of Justice, since May 2022. I am currently assigned to Detroit Group VII, investigating various federal firearm violations. Prior to being employed as a special agent, I was a police officer with the Detroit Police Department (DPD), for over seven (7) years, and the Grosse Pointe Park Department of Public Safety (GPPDPS), for over one (1) year. During that time, I was assigned to DPD's Special Operations unit, as well as the Special Response Team (SRT). I am a graduate of the ATF Special Agent Basic Training program and of the Detroit Police Department's Police Academy. I have also earned a Bachelor of Science in Criminal Justice with a concentration in Supervision and Management. During my employment with ATF, DPD, and GPPDPS, I have participated in numerous criminal investigations focused on firearms, armed drug trafficking violations and criminal street gangs. I have also investigated violations of Title 18, United States Code, Section 922(g)(1), Felon in Possession of a Firearm.

2. I make this affidavit from personal knowledge based on my participation in this investigation, as well as information received from other law enforcement officials and/or their reports and records. The information outlined herein is provided for the limited purpose of establishing probable cause and does not contain all details or facts that exist pertaining to the investigation. As set forth below, probable cause exists that Amont JOHNSON (DOB XX/XX/1994) violated 18 U.S.C. § 922(g)(1) (felon in possession of a firearm) on or about January 1, 2023, in the Eastern District of Michigan.

### PROBABLE CAUSE

3. On January 1, 2023, at approximately 0057 hours, DPD was called to 17366 Stoepel Street, Detroit, Michigan to respond to a domestic violence situation involving a person with a weapon. Once DPD officers arrived to the location, they observed a gray 2022 Dodge Ram bearing a Michigan license plate of EPV0667 with an unknown black male, later identified as Amont JOHNSON, in the driver's seat. JOHNSON exited the vehicle at which time a black firearm fell to the ground. JOHNSON picked up the firearm and put it into his coat pocket. The officers then approached JOHNSON and recovered the gun (one (1) loaded Ruger, Model: LCR-X, Serial Number: 54305272, .38 caliber revolver; containing one (1) live .38 caliber round and one (1) spent .38 caliber shell casing) from his coat pocket. When the officers attempted to place handcuffs on him, there was a struggle due to

JOHNSON resisting the officers and not following their verbal commands.

JOHNSON was taken to the ground where he was able to be handcuffed and taken into custody.

- 4. A review of the National Law Enforcement Telecommunications

  System (NLETS) computer printout regarding Amont JOHNSON's criminal history record revealed the following convictions:
  - 2019 Felony Transportation of Stolen Vehicles.
- 5. A review of the Law Enforcement Information Network's (LEIN) computer printout regarding Amont JOHNSON's computerized criminal history revealed the following convictions:
  - 2011 Felony Weapons Felony Firearm & Two (2) counts of
     Felony Assault with Intent to Rob While Unarmed.
- 6. Subsequently, ATF Special Agent and Interstate Nexus Expert Kevin Rambus physically and visually inspected the Ruger, Model: LCRX, .38 Caliber revolver recovered from JOHNSON. Special Agent Rambus determined that the recovered firearm is a "firearm" as defined under 18 U.S.C. § 921, was manufactured outside the State of Michigan after 1898, and thus had traveled in and affected interstate commerce.

### **CONCLUSION**

7. Probable cause exists to believe that Amont JOHNSON, having been previously convicted of at least one felony, did knowingly and intentionally possess a firearm that had previously traveled in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

Respectfully submitted,

Randall B. Olsen, Special Agent Bureau of Alcohol, Tobacco, Firearms, and Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means.

HON. DAVID R. GRAND

UNITED STATES MAGISTRATE JUDGE

Date: January 18, 2023